

2016-14-C Ann. Report ETC
266631

2014-43-C - Form 555
266632

Sage

VIA FEDEX 810304618531

September 7, 2016

Ms. Jocelyn Boyd
South Carolina Public Service Commission
101 Executive Center Dr.
Suite 100
Columbia, SC 29210

Re: Sage Telecom Communications, LLC Annual Report
Study Area Code 249030 (South Carolina): Docket No. 2016-14-C

Ms. Boyd:

Sage Telecom Communications, LLC (Sage) was designated by the South Carolina Public Service Commission as an Eligible Telecommunications Carrier (ETC) for the provision of wireless Lifeline services in Order No. 2014-632, approved on July 29, 2014. Pursuant to R. 103-690.1, Sage submits this Annual Report for Designated ETCs with respect to Lifeline services in South Carolina. A copy of this Report has also been submitted to the Office of Regulatory Staff.

R. 103-690.1(b)(3). Unfulfilled Service Requests

Response: Sage did not have any unfulfilled service requests in South Carolina in 2015.

R. 103-690.1(b)(4) Complaints or Trouble Reports per 1000 Handsets or Access Lines.

Response: Sage did not receive any complaints or trouble reports in 2015.

R. 103-690.1(b)(5). Compliance with Applicable Service Quality Standards and Consumer Protection Rules.

Response: Sage is committed to satisfying all applicable state and federal requirements related to consumer protection and service quality standards.

Sage complies with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service.

1. Disclose Rates and Terms of Service – These are fully disclosed in advertising as well as on Sage's website.
2. Make Coverage Maps Available – Coverage maps are available on Sage's website.

3. Provide contract terms – Sage does not employ extended service contracts.
4. Allow a trial service – All wireless services, including Lifeline-supported services, are provided on a pay-as-you-go basis and therefore there is no extended commitment to the service on the part of the customer. If the service does not suit their needs, they can cancel service at any time without penalty.
5. Provide Specific Disclosure in advertising – Sage advertising, including its website, fully discloses charges and service parameters.
6. Separately Identify Carrier Charges from Tax on Billing Statements – Sage does not render billing statements to its pay-as-you-go customers, but for every transaction they make, service charges vs. taxes are fully described.
7. Provide Customers with the Right to Terminate Service Upon Changes to Their Contract – As mentioned, we don't employ contracts so this provision does not apply. Customers can, however, cancel service at any time without penalty.
8. Provide Ready Access to Customer Service – Customers can call customer service for free by dialing 611 or an 800 number. These numbers are disclosed on the Sage's website and in advertising and customer welcome materials. Customers may also access Customer Service online through the Sage's website.
9. Promptly Respond to Customer Inquiries and Complaints from Government Agencies – Sage promptly responds to all complaints. If a customer care representative cannot help a customer, there is an escalation process. Sage is committed to resolving customer questions, concerns and complaints in a swift and satisfactory manner.
10. Privacy Policy – Sage protects the privacy of customer information in accordance with applicable federal and state laws. Our privacy policy is available, via link, on every page of Sage's website.
11. Provide Consumers with Free Notifications for Voice, Data and Messaging Usage, and International Roaming – Due to the Sage's service being provided on a pay-as-you-go basis, customers are not able to incur overage charges. However, Sage provides, at no charge, (a) a notification to consumers of domestic wireless plans that include limited data allowances when consumers approach their allowance for data usage; (b) a notification to consumers of domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach their allowance for those services; and (c) a notification to consumers without an international roaming plan/package whose devices have registered abroad and who may incur charges for international usage. Sage also clearly and conspicuously discloses tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.

12. Abide by the following principles regarding the ability of customers, former customers, and individual owners of eligible devices to unlock phones and tablets, ("mobile wireless devices") that are locked by or at the direction of the carrier –

- (1) Disclosure. Sage has posted on its website its clear, concise, and readily accessible policy on mobile wireless device unlocking.
- (2) Pay-as-you-go Unlocking Policy. Upon request, Sage will unlock pay-as-you-go mobile wireless devices no later than one year after initial activation, consistent with reasonable time, payment or usage requirements.

- (3) Notice. Sage will clearly notify customers that their devices are eligible for unlocking at the time when their devices are eligible for unlocking or automatically unlock devices remotely when devices are eligible for unlocking, without additional fee. Sage reserves the right to charge non-customers/non-former-customers with a reasonable fee for unlocking requests. Notice to pay-as-you-go customers may occur at point of sale, at the time of eligibility, or through a clear and concise statement of policy on the Sage's website.
- (4) Response Time. Within two business days after receiving a request, Sage will unlock eligible mobile wireless devices or initiate a request to the OEM to unlock the eligible device, or provide an explanation of why the device does not qualify for unlocking, or why the carrier reasonably needs additional time to process the request.
- (5) Deployed Personnel Unlocking Policy. Sage will unlock mobile wireless devices for deployed military personnel who are customers in good standing upon provision of deployment papers.

Sage reserves the right to decline an unlock request if it has a reasonable basis to believe the request is fraudulent or the device is stolen.

R. 103-690(b)(6). Ability to Function in Emergency Situations.

Response: As a reseller, Sage relies upon its underlying facilities-based carrier for functionality in emergency situations. Sage obtains from Sprint the network infrastructure and wireless transmission facilities that allow Sage to operate as a Mobile Virtual Network Operator (MVNO). Through this agreement, Sage provides its customers the same ability to remain functional in emergency situations as currently provided generator power and an extensive disaster recovery program. The Sprint wireless network has reasonable amounts of back-up power and the ability to reroute traffic around damaged facilities and manage traffic spikes resulting from emergency situations. As a reseller of Sprint, these capabilities benefit Sage's customers.

R. 103-690(b)(7). Non-Incumbent LEC Local Usage Plans.

Response: This section does not apply to Sage as it is a wireless ETC.

R. 103-690(b)(8). Equal Access to Long Distance Carriers.

Response: Sage understands that the Federal Communications Commission may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

R. 103-690(b)(9). Number of Lifeline Customers.

Response: As of December 31, 2015, Sage had zero Lifeline customers in South Carolina.

R. 103-690(b)(10). Lifeline Verification Survey of Certification.

Response: Sage attaches hereto a copy of its Lifeline Verification Survey (FCC Form 555) that was provided to the Universal Service Administration Company in January 2016.

If you have any questions regarding this correspondence, please contact me at (214) 495-4723 or cmilligan@truconnect.com.

Respectfully,

A handwritten signature in black ink, appearing to read 'Cassandra Milligan', with a stylized flourish at the end.

Cassandra Milligan
Regulatory Affairs
Sage Telecom Communications, LLC

Enclosures

Annual Lifeline Eligible Telecommunications Carrier Certification Form

All carriers must complete all or portions of all sections

Form must be submitted to USAC and filed with the Federal Communications Commission

IMPORTANT: PLEASE READ INSTRUCTIONS FIRST

Deadline: January 31st (Annually)

249030

Study Area Code (SAC)

(An Eligible Telecommunications Carrier (ETC) must provide a certification form for *each* SAC through which it provides Lifeline service).

SC

State

TruConnect

DBA, Marketing or Other Branding Name
(If same as ETC name, list "N/A" Do not leave blank)

Sage Telecom Communications LLC

ETC Name

TSC Acquisition Corporation

Holding Company Name
(If same as ETC name, list "N/A" Do not leave blank)

Does the reporting company have affiliated ETCs?

Yes ☒

No ☐

Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

Affiliated ETC's SAC	Affiliated ETC's Name
-- See attached worksheet --	

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

Section 1: Initial Certification All ETCs must complete this section

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial NRJ

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Section 2: Annual Recertification

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

A	B	C	D	E = (A - B - C - D)
Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year <i>(February data month)</i>	Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers	Number of subscribers claimed on the February FCC Form 497 that were <u>initially</u> enrolled in the current Form 555 calendar year <i>(These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)</i>	Number of subscribers de-enrolled prior to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC	Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year
0	0	0	0	0

Recertification Results:

F	G	H = (F-G)	I	J = (H+I)
Number of subscribers ETC contacted directly to recertify eligibility through attestation	Number of subscribers responding to ETC contact	Number of non-responding subscribers	Number of subscribers responding that they are no longer eligible <i>(This should be a subset of Block G.)</i>	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt
0	0	0	0	0

K	L
Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC
0	0

Note: If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.

The total of Block F and Block K should equal the number reported in Block E.

Certification:

Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.

A.) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial _____

AND/OR

B.) I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on: _____ Results are provided in the chart above in Blocks K through L. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial _____

OR

C.) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial NRJ

Section 3: De-enroll Percentage

Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.

$M = (F+K)$	$N = (J+L)$	$O = ((N + M) * 100)$
Number of subscribers that the ETC attempted to recertify directly or through a state administrator, ETC access to a state database, or by USAC (This should equal the number reported in Block E)	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or ineligibility	Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response
0	0	0.0%

Section 4: Pre-Paid ETCs

All ETCs must complete the appropriate check-box; pre-paid ETCs must complete all of Section 4. Pre-paid ETCs generally do not assess or collect a monthly fee from their Lifeline subscribers. ETCs that only assess a fee but do not collect such fees are pre-paid ETCs and must complete the chart below.

Is the ETC Pre-Paid? Yes ☒ No ☒

If Yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
Total Subscribers	0

Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,

Certified Online

Signature of Officer

njohnson@truconnect.com

Email Address of Officer

Cassandra Milligan

Person Completing This Certification Form

Nathan Johnson, Co-CEO

Printed Name and Title of Officer

01/29/2016

Date

214-495-4723

Contact Phone Number

Affiliated ETCs

[illegible]